

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

MICHAEL GRECCO PRODUCTIONS, INC.,

*Plaintiff,*

v.

ALAMY INC.,

*Defendant.*

1:18-cv-03260-PKC-JO

**DECLARATION OF BRITTANY L. KAPLAN-PETERSON**

BRITTANY L. KAPLAN-PETERSON declares as follows:

1. I am associated with Cowan, DeBaets, Abrahams & Sheppard LLP, attorneys for defendant Alamy Inc. ("Defendant") in the above-captioned matter. I make this declaration in support of Defendant's Motion to Dismiss.

2. Attached hereto as Exhibit 1 is a true and correct copy of a screenshot of the website located at the URL <https://discussion.alamy.com/topic/1683-have-you-found-any-alamy-photographs-january-2014/?page=9> as of June 4, 2018.

3. Attached hereto as Exhibit 2 is a true and correct copy of a screenshot of the same website, located at the URL <https://discussion.alamy.com/topic/1683-have-you-found-any-alamy-photographs-january-2014/?page=9>, as of August 23, 2018.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on August 23, 2018  
New York, New York

*Brittany L. Kaplan-Peterson*  
BRITTANY L. KAPLAN-PETERSON

## **Exhibit 1**

<https://discussion.alamy.com/topic/1683-have-you-found-any-alamy-photographs-january-2014/?page=9>

**Michael Ventura**

Forum regular



Verified

2,653

1,615 posts

Location: Washington DC  
Area

Images: 7947

Joined Alamy: 27 Jan 2005

Posted January 17, 2014

USA, "The Ultimate Insider's Source" Caribbean Travel & Life 2014

Pg. 12 & 13, Aerial view of the Bahamas. BR8A13 Bluegreen Pictures



Pg. 14, Bob Marley (cut out), D9WH9D Superstock



Pg. 20, Jamaican hot sauces (heavy crop), ADGFJ7 Cuboimages srl



Pg. 22, Goat racing Tobago, B0HNY7 Imagestate Media Partners Limited-Impact Photos

## **Exhibit 2**



## Michael Ventura

Forum regular



Verified

2,735

1,402 posts

Location: Washington DC Area

Images: 7976

Joined Alamy 27 Jan 2005

Posted January 17, 2014

USA, "The Ultimate Insider's Source" Caribbean Travel & Life 2014

Pg. 12 & 13, Aerial view of the Bahamas, BR&A13 Bluegreen Pictures



Pg. 20, Jamaican hot sauces (heavy crop), ADGFJ7 Cuboimages srl



Pg. 22, Goat racing Tobago, B0HNY7 Imagestate Media Partners Limited-Impact Photos



Pg. 25, Plane landing, St. Maarten, BC1TCT Horizons WWP